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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PHILIP BOUCHARD,)	Case No.: 2:20-cv-01084-JCM-BNW
)	
Plaintiff,)	
)	
vs.)	
)	
NATIONAL CASUALTY COMPANY, a)	STIPULATION AND ORDER FOR
foreign corporation; COAST NATIONAL)	STAY PENDING RULING ON
INSURANCE COMPANY dba FOREMOST)	VARIOUS PENDING MOTIONS
INSURANCE GROUP, a foreign entity;)	
SELMAN BREITMAN LLP, a foreign limit)	
liability partnership; STEPHENSON &)	
DICKINSON, a Nevada professional)	
corporation; DOES 1 through 10, and ROE)	
CORPORATIONS 1 through 20, inclusive,)	
)	
Defendants.)	
_____)	

Plaintiff Philip Bouchard (hereafter “Plaintiff”), by and through his attorney of record, Jordan P. Schnitzer, Esq. of the The Schnitzer Law Firm, Defendant Coast National Insurance Company dba Foremost Insurance Group (hereafter “CNIC”), by and through its attorneys of record, David J. Feldman, Esq. and John C. Dorame, Esq. of The Feldman Firm, P.C., Defendant National Casualty Company (hereafter “NCC”), by and through its attorneys of record, Robert W. Freeman, Esq. and Priscilla L. O’Briant, Esq. of Lewis Brisbois Bisgaard & Smith LLP, Defendant Stephenson & Dickinson, by and through its attorneys of record, Sheri Thome, Esq. of Wilson Elser Moskowitz Edelman & Dicker LLP, and Defendant Selman Breitman LLP, by and through its attorneys of record, Nathaniel S. Braun, Esq. and Gil Glancz, Esq. of Selman Breitman LLP,

1 and hereby provides their joint stipulated request for a stay of discovery pending the Court's ruling
 2 on CNIC's Motion to Dismiss (ECF No. 5), Selman Breitman LLP.'s Motion to Dismiss (ECF No.
 3 7), Plaintiff's Motion to Remand (ECF No. 10), and NCC's Motion to Consolidate (ECF No. 19).

4 The parties attended the FRCP 26(f) conference on August 14, 2020. However, various
 5 parties have filed several Motions, as noted, that will remain pending for ruling as the parties
 6 would otherwise press the matter toward completion of discovery. Given the potential impact upon
 7 discovery actions from ruling on Plaintiff's Motion to Remand, NCC's Motion to Consolidate, as
 8 well as CNIC and Selman Breitman LLP.'s Motions to Dismiss, in an effort to cooperate and
 9 attempt preservation of resources, the parties submit this stipulated request for a stay of discovery
 10 and related litigation deadlines pending the Court's ruling on the now pending Motion to Remand,
 11 Motion to Consolidate, and Motions to Dismiss.

12 Pursuant to this joint request, deadlines in the Federal Rules of Civil Procedure and the
 13 Local Rules of this Court should be stayed until resolution of the Motion to Remand and Motions
 14 to Dismiss, and discovery directed to and between the parties will be stayed by the Court's Order
 15 on this stipulated request. In addition, the parties stipulate that they will serve no other pleading
 16 or papers unless ordered by the Court.

17 The parties further stipulate that the stay should remain in effect until further Order of the
 18 Court for the Motion to Remand, Motion to Consolidate, and Motions to Dismiss, now pending,
 19 and that within fourteen (14) days of the ruling upon the Motion to Remand, Motion to Consolidate
 20 and/or Motions to Dismiss, whichever shall be first decided, the parties will jointly submit a
 21 scheduling order with the time constraints of LR 26-1 as calculated from the date of the Court's
 22 ruling on the pending Motions.

23 Dated: 9/1/2020

24 /s/ David Feldman

David J. Feldman, Esq.

Nevada Bar No. 5947

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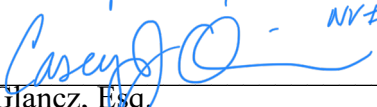
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Attorneys for Defendant Coast National Insurance Company

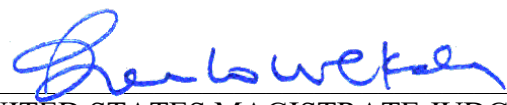
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The parties so stipulate.

<p>Dated: <u>9/1/2020</u></p> <p>By: <u>/s/ Jordan Schnitzer</u> Jordan P. Schnitzer, Esq. Nevada Bar No. 10744 9205 W. Russell Road, Suite 240 Las Vegas, Nevada 89148 Telephone: (702) 960-4050 Facsimile: (702) 960-4092 Jordan@TheSchnitzerLawFirm.com <i>Attorney for Plaintiff</i></p>	<p>Dated: <u>9/1/2020</u></p> <p>By: <u>/s/ Sheri Thome</u> Sheri Thome, Esq. Nevada Bar No. 8657 300 S. 4th St., 11th Floor Las Vegas, NV 89101 Phone 702.727.1400 Fax 702.727.1401 Sheri.Thome@wilsonelser.com <i>Attorney for Stephenson & Dickinson</i></p>
<p>Dated: <u>Sept. 1, 2020</u></p> <p>By: <u> NV#11248</u> Gil Glancz, Esq. Nevada Bar No. 9813 Nathaniel S. Braun, Esq. <i>Pro Hac Vice</i> pending 3993 Howard Hughes Pkwy., Suite 200 Las Vegas, NV 89169 Phone 702.228.7717 Fax 702.228.8824 nbraun@selmanlaw.com glancz@selmanlaw.com <i>Attorneys for Selman Breitman LLP</i></p>	<p>Dated: <u>9/1/2020</u></p> <p>By: <u>/s/ Robert Freeman</u> Robert W. Freeman, Esq. Nevada Bar No. 3062 Priscilla L. O'Briant, Esq. Nevada Bar No. 10171 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Telephone: (702) 893-3383 Fax: (702) 893-3789 Robert.Freeman@lewisbrisbois.com Priscilla.Obriant@lewisbrisbois.com <i>Attorneys for National Casualty Company</i></p>

ORDER

IT IS SO ORDERED the instant matter is hereby stayed consistent with the parties' joint stipulated request, until ruling upon CNIC's Motion to Dismiss (ECF No. 5), Selman Breitman LLP.'s Motion to Dismiss (ECF No. 7), and NCC's Motion to Consolidate (ECF No. 19), and/or Plaintiff's Motion to Remand (ECF No. 10), after which the parties will jointly submit to the Court within fourteen (14) days a Case Scheduling Order that comports with LR 26-1 as measured from the date of the Court's ruling on the pending Motions.


 UNITED STATES MAGISTRATE JUDGE
 Dated: September 3, 2020